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Settlement Date: March 2, 2015 at 12:00 p.m.
Objection Date: March 2, 2015 at 11:00 a.m.

*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA
Liquidation of Bernard L. Madoff Investment
Securities LLC and for the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

THE ESTATE (SUCCESSION) OF DORIS
IGOIN, LAURENCE APFELBAUM, individually
and in her capacities as executor and beneficiary of
the Estate (Succession) of Doris Igoi, and EMILIE

Adv. Pro. No. 10-04336 (SMB)

APFELBAUM,

Defendants.

NOTICE OF SETTLEMENT OF ORDER DENYING
MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION
AND FORUM NON CONVENIENS

PLEASE TAKE NOTICE that pursuant to the Memorandum Decision Regarding Defendants' Motion to Dismiss for Lack of Personal Jurisdiction and *Forum Non Conveniens* entered by this Court in the above-referenced adversary proceeding on February 13, 2015 (ECF No. 133), and upon direction of the court, the undersigned counsel to plaintiff Irving H. Picard, as trustee (the "Trustee") for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa *et seq.*, and the Estate of Bernard L. Madoff, individually, will present the attached proposed order to the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, for settlement and signature in his chambers located at the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, 10004 on **March 2, 2015 at 12:00 p.m.**

PLEASE TAKE FURTHER NOTICE that any counter-proposed orders and/or objections to the proposed order must be made in writing and received in the Bankruptcy Judge's chambers and by the undersigned not later than **March 2, 2015 at 11:00 a.m.** (with a courtesy copy delivered to the chambers of the Honorable Stuart M. Bernstein) and must be served upon (a) Baker & Hostetler LLP, counsel for the Trustee, 45 Rockefeller Plaza, New York, New York 10111, Attn: David J. Sheehan, Esq., (b) the Securities Investor Protection Corporation, 805 Fifteenth Street, NW, Suite 800, Washington D.C. 20005, Attn: Kevin H. Bell, Esq., and (c)

Kelley Drye & Warren, LLP, counsel for the Defendants, 101 Park Avenue, New York, New York 10178, Attn: Jonathan K. Cooperman, Esq. Any objections must specifically state the interest that the objecting party has in these proceedings and the specific basis of any objection to the proposed order. Unless a counter-proposed order and/or written objection are received before the objection deadline, the proposed order may be signed and entered.

Dated: New York, NY
February 25, 2015

BAKER & HOSTETLER LLP

By: /s/ Nicholas J. Cremona
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*Attorneys for Plaintiff Irving H. Picard, Trustee for
the Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC and
for the Estate of Bernard L. Madoff*

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Attn: Jonathan K. Cooperman, Esq.

*Attorneys for Defendants the Estate (Succession) of Doris Igoi, Laurence Apfelbaum,
and Emilie Apfelbaum*